

REMARKS

Claims 1-48 and 51-55 are pending in the application. Claims 1-48 and 51-55 stand rejected. Claims 39-46 and 48-52 stand rejected under 35 U.S.C. § 101. Claims 1-48 and 51-55 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 7,016,977 issued to Dunsmoir (hereinafter "Dunsmoir") further in view of non-patent literature document "CSS Mobile Profile 1.0, W3C" (October 2000, pages 1-15) by Wugofski et al (hereinafter "Wugofski").

Claims 39-46 and 48-52 are canceled. Reconsideration is requested. The rejections are traversed. No new matter is added. Claims 1-48 and 51-55 remain in the case for consideration.

REJECTIONS UNDER 35 U.S.C. § 101

Claims 39-46 stand rejected under 35 U.S.C. § 101 because the claim is not limited to statutory subject matter. The phrase "An article comprising a computer-readable modulated carrier signal" describes a signal not limited to tangible embodiments.

Claims 48-52 stand rejected under 35 U.S.C. § 101, which describes, "A gadget file structure", the claims fail to include a computer readable medium for processing the file structure for presenting content to a user and the limitations therefore describe non-functional descriptive material.

Without acknowledging the propriety of these rejections, the applicant has canceled the rejected claims in order to advance prosecution of this application. Accordingly, the 35 U.S.C. § 101 rejections are rendered moot.

REJECTIONS UNDER 35 U.S.C. § 103

Claims 1-48 and 51-55 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 7,016,977 issued to Dunsmoir (hereinafter "Dunsmoir") further in view of non-patent literature document "CSS Mobile Profile 1.0, W3C" (October 2000, pages 1-15) by Wugofski et al (hereinafter "Wugofski"). The applicant traverses the rejections.

Regarding claim 1, the claim recites "a plurality of layout information files to describe how a layout string is displayed for a unique combination of a language and a device." The Examiner proposes that Dunsmoir teaches "a plurality of layout information string files which are defined by the layout definitions, these are combined with the content to display the webpage

in a specific language” and that the “layout definitions describe how a layout string is displayed for a unique language” (*see* Office Action, page 3). However, what Dunsmoir actually teaches is: a plurality of static web pages 7 (*see* Dunsmoir FIG. 2); which can be passed to a Boson servlet (*see* Dunsmoir col. 3, lines 38-42); the Boson servlet then extracts a template from the static web page 7 (*see* Dunsmoir col. 3, lines 47-52 and related patent no. 7,174,506) and passes tags from the template to the Quark servlet (*see* related patent no. 7,174,506 col. 8, lines 1-51); the Quark servlet then accesses a dictionary file to find alternate language strings for each of the tags and passes them back to the Boson servlet (*see id*); and the Boson servlet replaces the original language strings with the alternate language strings (retaining the original formatting) and passes the modified web page back to the browser (*see id*). Thus, Dunsmoir does not teach a plurality of layout information files that describe how a layout string is displayed for a unique language, as the Examiner proposes; instead, Dunsmoir teaches that a template is extracted from a static web page on a real-time basis so that alternate language substitutions can be made. So, at best, Dunsmoir could only be considered to teach a single layout information file (the template that is extracted from the static web page each time a different language is requested. Thus, Dunsmoir does not teach this feature as proposed by the Examiner.

Further, the Examiner acknowledges that Dunsmoir does not teach a layout information file describing how a layout string is displayed for a unique combination of a language and a device (*see* Office Action, page 3). But then the Examiner proposes that Wugofski teaches style sheets for multiple devices and that it would be obvious to combine these teachings with Dunsmoir. The applicant disagrees. First, Dunsmoir teaches away from the proposed combination. Specifically, Dunsmoir states “the inventive web server is provided with a database or file system containing a single-language web site, and a database or file system containing the suitable translations of the web site content (but not layout)” (*see* Dunsmoir col. 3, lines 9-12, emphasis added). Thus, Dunsmoir specifically teaches that the layout of its web page is not modified, yet the Examiner proposes that it is obvious to modify Dunsmoir to change the layout of its web page. The Examiner’s proposal is contrary to the explicit teachings in Dunsmoir. Accordingly, Dunsmoir teaches away from the proposed combination with Wugofski and thus the combination is not obvious. *See* MPEP § 2141.03.

Second, the Examiner has not described how exactly the system of Dunsmoir could be modified to include the style sheets of Wugofski. Specifically, Dunsmoir (in combination with

the related patent 7,174,506) teaches that static web pages are parsed by the Boson servlet to extract a template and that this template is used to rebuild the web page with alternate language strings provided by the Quark servlet. It is not clear where in this process the Examiner is proposing to insert the style sheets of Wugofski or how such style sheets could even work with the system described in Dunsmoir.

Third, the proposed combination does not result in the claimed invention. The claim refers to “a unique combination of a language and a device.” Neither Dunsmoir nor Wugofski teaches that style sheets can be used to describe how a layout string is displayed for a unique combination of a language and a device. Quite the opposite, Dunsmoir merely teaches that a static web page can be modified to display only in a different language and Wugofski merely teaches, according to the Examiner, that style sheets can be used to display documents across multiple devices, not unique combinations of languages or devices. Thus, even when combined as the Examiner proposes, these references do not teach layout information files that describe how a layout string is displayed for a unique combination of a language and a device.

Claim 1 also recites “a computer to store the layout strings files and the layout information files.” The Examiner proposes that Dunsmoir teaches that “both the layout strings and content are stored in a computer” (*see* Office Action, page 3). However, Dunsmoir does not teach that any layout information files are stored in its server. Quite the opposite, Dunsmoir specifically teaches that a template is extracted from a static web page on a real-time basis by parsing out tags for all of the content in response to a request by a user for a different language (*see* Dunsmoir col. 3, lines 38-52). Thus, there is no reason for the system of Dunsmoir to store a layout information file because every time a user requests a different language, the Boson server builds a new template for the static web page. Accordingly, Dunsmoir does not teach this feature of claim 1 as the Examiner proposes.

For each of these reasons, claim 1 is allowable over the combination of Dunsmoir and Wugofski as the combination does not teach all of the features of the claim. Dependent claims 2-15 are likewise allowable.

Further regarding claim 3, the claim recites “a resource file map to store at least two combinations of a layout information file and languages in which the layout strings files store the layout strings.” The Examiner proposes that this feature is taught in Dunsmoir at col. 3, lines 10-60 (*see* Office Action, pages 3-4). However, the cited portion of Dunsmoir does not teach

anything about a resource file map. Quite the opposite, in Dunsmoir the template for the static web page does not even exist until the user requests a different language and the Boson servlet creates the template (*see* Dunsmoir col. 3, lines 38-52); so, there could not be a resource file map that stores at least two combinations of a layout information file and languages in which the layout strings files store the layout strings. Moreover, as described in the related Dunsmoir application, the mapping of the different language strings to the web page template occurs in real-time as a response to a request for an alternate language from a user (*see* related Dunsmoir patent no. 7,174,506 col. 8, lines 1-51). So, there would be no reason for the system of Dunsmoir to contain a resource file map.

Claim 3 also recites “a ranked list of languages.” The Examiner proposes that this feature is taught in the same portion of Dunsmoir. However, nowhere in the entire disclosure does Dunsmoir teach a ranked list of languages. Dunsmoir’s system generates the alternate-language webpage based on a specific language request from a user; not a ranked list of languages.

Finally, claim 3 recites “a selector to select one of the plurality of layout information files and one layout strings file based on the ranked list of languages and the resource file map.” As Dunsmoir does not teach a ranked list of languages, Dunsmoir cannot teach this feature. Further, there is no reason for the system of Dunsmoir to include a selector because the alternate language is selected by the user by “selection of specific hyperlinks or input into a form field” (*see* Dunsmoir col. 3, lines 38-39).

In summary, Dunsmoir does not teach any of the features of claim 3. The combination with Wugofski does not remedy these deficiencies. For at least these additional reasons, claim 3 is allowable over the combination of Dunsmoir and Wugofski. Dependent claims 4-7 are likewise allowable.

Further, regarding claim 5, the claim recites “the resource file map stores combinations of layout information files, languages in which the layout strings files store the layout strings, and identities of devices for display of the information.” The Examiner acknowledges that Dunsmoir does not teach this feature, but then proposes that this feature is taught in Wugofski (*see* Office Action, page 4). However, Wugofski does not teach a resource file map storing combinations of layout information files, languages, and device identities. Wugofski does not teach a resource file map at all. Consequently, Wugofski does not teach the features of claim 5 and does not remedy the deficiencies of Dunsmoir. For at least this additional reason, claim 5 is allowable

over the combination of Dunsmoir and Wugofski. Claim 6 recites a similar feature and is allowable for at least the same reasons as claim 5.

Further regarding claim 7, the claim recites “the resource file map stores information about context-dependent data not stored in the layout information files or the layout strings files.” The Examiner proposes that this feature is taught in Dunsmoir at col. 3, lines 10-60 (*see* Office Action, page 4). However, as described above, Dunsmoir does not teach a resource file map, so it cannot teach this feature. Further, nothing in the disclosure of Dunsmoir teaches anything about context-dependent data not stored in the layout information files or the layout strings files. If the Examiner believes otherwise, the Examiner is requested to provide references to specific teachings in Dunsmoir rather than a blanket citation to essentially the entire detailed description of Dunsmoir.

Further regarding claim 9, the claim recites “at least one layout information file specifies a placement for the layout string on the default device.” The Examiner proposes that this feature is taught in Dunsmoir, once again pointing to essentially the entire detailed description of Dunsmoir. However, as described above, Dunsmoir does not teach a layout information file, so it could not teach this feature. Further, as acknowledged by the Examiner in the rejection of claim 1, Dunsmoir does not teach layout information files related to specific devices. Consequently, Dunsmoir does not teach this feature of claim 9, and the Examiner’s position is contrary to earlier rejections in the Office Action.

Further regarding claim 12, the claim recites “means for selecting one of the plurality of layout information files and one layout strings file based on a ranked list of languages.” The Office Action proposes that this feature is taught in Dunsmoir. However, as detailed above, Dunsmoir does not teach a ranked list of languages, so it could not teach this feature. Further the applicant finds no such teachings in Dunsmoir. If the Examiner intends to maintain this rejection, the applicant requests that the Examiner point to specific teachings in Dunsmoir related to the claim features.

Regarding claim 16, the claim recites several features that are similar to those discussed above with respect to claim 1. Accordingly, claim 16 is allowable over the combination of Dunsmoir and Wugofski for at least the same reasons discussed above with respect to claim 1. Dependent claims 17-30 are likewise allowable.

Further regarding claim 17, the claim recites “obtaining the content from a content provider.” The Examiner proposes that this feature is taught in Dunsmoir (*see* Office Action, page 6). To the contrary, Dunsmoir does not teach anywhere in its disclosure that content is obtained from a content provider. Instead, Dunsmoir simply teaches that, in response to a user request, either a static web page is returned from its local store or a locally modified version of the static web page from its local store is returned (*see* Dunsmoir col. 3, lines 21-61). Dunsmoir does not teach that any content is obtained from a content provider; all of its content is stored locally. Consequently, Dunsmoir does not teach this feature of claim 17. For at least this additional reason, claim 17 is allowable over the combination of Dunsmoir and Wugofski.

Further regarding claim 20, the claim recites “receiving a ranked list of languages from the user.” The Examiner proposes that this feature is taught in Dunsmoir. The applicant disagrees. Dunsmoir merely teaches that a user can select an alternate language by “selection of specific hyperlinks or input into a form field” (*see* Dunsmoir col. 3, lines 38-39). Dunsmoir does not teach that the user can provide a ranked list of languages. Further, there would be no reason for Dunsmoir to teach this because there is no indication that the system of Dunsmoir has any capability of selecting between any languages in a list. Consequently, Dunsmoir does not teach this feature of claim 20. For at least this additional reason, claim 20 is allowable over the combination of Dunsmoir and Wugofski.

Further regarding claim 21, the claim recites “identifying a highest-ranked language from the ranked list of languages such that one of the plurality of layout information files and the one of the plurality of layout strings files exist for the highest-ranked language.” Once again, the Examiner points to Dunsmoir as teaching this feature, but Dunsmoir does not contain any teachings related to a ranked list of languages. Thus, Dunsmoir can not teach identifying a highest-ranked language from such a list. For at least this additional reason, claim 21 is allowable over the combination of Dunsmoir and Wugofski.

Further regarding claim 22, the claim recites “accessing a resource file map listing all combinations of layout information files, languages, and devices.” As discussed above, neither Dunsmoir nor Wugofski teaches a resource file map listing combinations of layout information files, languages, and devices. Consequently, the combination of Dunsmoir and Wugofski cannot teach this feature of claim 22. Further, the combination of Dunsmoir and Wugofski cannot teach accessing such a resource file map when it does not teach a resource file map in the first place.

For at least these additional reasons, claim 22 is allowable over the combination of Dunsmoir and Wugofski.

Further regarding claim 25, the claim recites “a resource file map storing information about other context-dependent data.” The Examiner proposes that this feature is taught in Dunsmoir. However, Dunsmoir does not teach anything about context-dependent data and it does not teach a resource file map storing such context-dependent data. Consequently, Dunsmoir does not teach the features of claim 25. For at least these additional reasons, claim 25 is allowable over the combination of Dunsmoir and Wugofski.

Regarding claims 31-38, the claims recite features similar to those discussed above with respect to claims 16-30. Accordingly, claims 31-38 are allowable over the combination of Dunsmoir and Wugofski for at least the same reasons detailed above with respect to claims 16-30.

Regarding claim 47, the claim recites features similar to those discussed above with respect to claim 16. Accordingly, claim 47 is allowable over the combination of Dunsmoir and Wugofski for at least the same reasons detailed above with respect to claim 16.

Regarding claim 53, the claim recites several features that have been previously discussed, such as: a resource file map; a ranked list of languages; and a selector. As discussed previously, the combination of Dunsmoir and Wugofski does not teach these features. Accordingly, claim 53 is allowable over the combination of Dunsmoir and Wugofski, as the combination does not teach all of the features of the claim.

Regarding claim 54, the claim recites “a third directory storing at least one layout information file for a second combination of a language and a second device.” The Examiner has rejected this claim under the combination of Dunsmoir and Wugofski, but has not pointed to any specific teachings in either of the references as teaching this feature (*see* Office Action, page 16). Instead, the Examiner has merely repeated the rejections of previous claims (*see id*). Further, the applicant does not find any teachings in either Dunsmoir or Wugofski as teaching this feature. Consequently, claim 54 is allowable over the combination of Dunsmoir and Wugofski at least because the combination does not teach all of the features of the claim. Dependent claim 55 is likewise allowable.

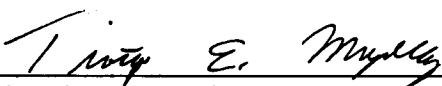
PRIOR ART MADE OF RECORD

The applicant would like to thank Examiner Patel for identifying these potentially relevant prior art references. After reviewing the references cited, the applicant believes that the present invention is patentably distinguishable over the cited references.

For the foregoing reasons, reconsideration and allowance of the pending claims of the application as amended is requested. The Examiner is encouraged to telephone the undersigned at (503) 222-3613 if it appears that an interview would be helpful in advancing the case.

Respectfully submitted,

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